

Hon. Marc Barreca
Chapter 13
Hearing Date: November 18, 2010
Hearing Time: 9:30 a.m.
Response Date: November 11, 2010

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

NO. 10-15781

In re

MICHAEL REID MOI,

Debtor.

RESPONSE TO OBJECTION TO CONFIRMATION

Debtor, by and through counsel, responds to the objection to confirmation as follows:

1. The debtor has been making Plan payments and is current.

2. The debtor has listed property for sale in which an earnest money is actively being negotiated. The proposed sale of the property should be sufficient to pay all allowed creditors in full.

3. Mr. Kruger does not have an allowed claim in these proceedings.

4. Debtor incorporates herein the prior response to objection to confirmation by this creditor and further, incorporates herein the objection to claim and counterclaims currently pending in this court.

Dated this 11th day of November, 2010.

/s/ Marc S. Stern
 Marc S. Stern
 WSBN 8194
 Attorney for debtor

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MARC S. STERN
ATTORNEY AT LAW
1825 NW 65TH STREET
SEATTLE, WA 98117
(206)448-7996